

## REMARKS

In the Office Action mailed August 15, 2006, claims 1-16 were rejected under 35 U.S.C. §102(e) as being anticipated by Bigelow (US Patent No. 6,647,305 B1). Applicants respectfully request reconsideration of the application in view of the foregoing amendments and the following remarks.

Independent claim 1, as amended, recites in part:

at least one tool object, the at least one tool object configured to be referenced in product information, the at least one tool object configured to be changed without causing the product information to be changed, and the at least one tool object configured to represent all of a plurality of versions of a tool or a part of a tool; and

a tool usage instruction generator,

wherein the instruction generator is configured to generate and output at least one instruction identifying which version of the tool or the part of the tool to be used in the manufacturing environment,

wherein the version of the tool or the part of the tool to be used is based on the tool object, wherein the version of the tool or the part of the tool is based on product information, and

wherein the tool usage instruction generator is configured to output the generated tool usage instruction.

Independent claim 7, as amended, recites in part:

wherein at least one of the generated one or more installation instructions identifies which version of a tool or a part of the tool to be used in a manufacturing environment,

wherein the version of the tool or the part of the tool to be used is based on the tool object,

wherein the at least one tool object is configured to represent all of a plurality of versions of a tool or a part of a tool, and

wherein the version of the tool or the part of the tool is based on the product information.

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Independent claim 12, as amended, recites in part:

wherein the definition of the functional deliverable of the product received includes at least one tool resource object,  
wherein at least one of the generated one or more installation instructions identifies which version of a tool or a part of the tool to be used in a manufacturing environment,  
wherein the version of the tool or the part of the tool to be used is based on the tool resource object,  
wherein the at least one tool resource object is configured to represent all of a plurality of versions of a tool or a part of a tool, and  
wherein the version of the tool or the part of the tool is based on product information.

In contrast, Bigelow states in the Abstract that:

The scripting engine generates the assembly instructions and a product configuration form from the defined relationships.

Bigelow also states at column 10 beginning at line 10:

It is contemplated that the system 100 can create (export)  
... assembly documentation...

Bigelow fails to disclose any details on how the scripting engine generates assembly instructions or any detail on the contents of the assembly instructions. Therefore, Bigelow fails to teach and/or suggest independent claims 1, 7, or 12, as amended.

Regarding claim 1, Bigelow fails to teach and/or suggest “wherein the instruction generator is configured to generate and output at least one instruction identifying which version of the tool or the part of the tool to be used in the manufacturing environment, wherein the version of the tool or the part of the tool to be used is based on the tool object, and wherein the version of the tool or the part of the tool is based on product information.”

Regarding claim 7, Bigelow fails to teach and/or suggest “wherein at least one of the generated one or more installation instructions identifies which version of a tool or a part of the tool to be used in a manufacturing environment, wherein the version of the tool or the part of the tool to be used is based on the tool object, wherein the at least one tool object is configured to represent all of a plurality of versions of a tool or a part of a tool, and wherein the version of the tool or the part of the tool is based on the product information.”

Regarding claim 12, Bigelow fails to teach and/or suggest “wherein at least one of the generated one or more installation instructions identifies which version of a tool or a part of the tool to be used in a manufacturing environment, wherein the version of the tool or the part of the tool to be used is based on the tool resource object, wherein the at least one tool resource objects is configured to represent all of a plurality of versions of a tool or a part of a tool, and wherein the version of the tool or the part of the tool is based on product information.”

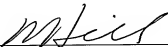
Consequently, Bigelow fails to teach and/or suggest each element recited in independent claims 1, 7, and 12. Claims 2-6, 8-11, and 13-16 depend either directly or indirectly from claims 1, 7, or 12 respectively. Accordingly, Applicants request reconsideration and withdrawal of the rejections of claims 1-16 under 35 U.S.C. §102(e) as being anticipated by Bigelow.

### CONCLUSION

Applicants respectfully submit pending claims 1-16 are now in condition for allowance. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Respectfully Submitted,

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